



George McClellan  
609.468.0127  
george@mcbelegal.com

27 June 2023

Via ECF

The Honorable Leda Dunn Wettre, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, New Jersey 07101

**Re: Ramesh Sawhney, et al. v. Chubb Insurance Company of New Jersey**  
**Docket Number: 2:21-cv-14675**

Dear Judge Wettre:

This firm represents Defendant Chubb Insurance Company of New Jersey (“Chubb”) in the above captioned insurance coverage litigation. On behalf of the parties, Chubb respectfully submits this joint letter in response to the Order of the Court dated June 26, 2023 directing the parties to submit a joint letter regarding the depositions.

Pursuant to the Order of the Court dated February 17, 2023 (Dkt. 60), on May 2, 2023, Ramesh Sawhney, M.D. was deposed; and on May 9, 2023, Nina Bhardwaj, M.D. was deposed. Due to unforeseen conflicts posed by medical treatments, an emergency and terminal family medical issue, and a scheduling error, Chubb requested that the dates for the depositions of Andrea Pitsch, Diane Forestall, and William McCudden be rescheduled at mutually convenient dates and times. [If it would be helpful to the Court, Chubb will prepare a motion pursuant to Local Fed. R. Civ. P. 5.3 to file under seal the personal information precipitating the requests.] As Chubb expressed to Plaintiffs’ counsel, Chubb greatly appreciated the courtesies extended to these three witnesses in accommodating these unforeseen complications. As Plaintiffs’ counsel advised the Court on May 8, 2023 (Dkt. 69), these witnesses were rescheduled at Chubb’s request. Mr. McCudden is scheduled for June 29, 2023; Ms. Pitsch, for July 6, 2023; and Ms. Forstell, for July 11, 2023. Non-party Gary McGowan was deposed on May 30, 2023. A corporate designee from non-party Aiston Fine Art Storage was deposed on June 13, 2023. No other fact witnesses remain to be deposed.

The parties respectfully thank the Court for its time and consideration.

Respectfully submitted,

McClellan Bernstiel LLP

A handwritten signature in black ink, appearing to read "George McClellan". The signature is written in a cursive, flowing style.

George McClellan

c: Richard A. Fogel, Esq. (via ECF)